

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

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In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and Bernard L. Madoff,

Plaintiff,

v.

BANCO ITAÚ EUROPA LUXEMBOURG  
S.A., and BANCO ITAÚ EUROPA  
INTERNATIONAL,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01019 (CGM)

**DECLARATION OF RANDALL MARTIN IN SUPPORT  
OF THE ITAÚ DEFENDANTS' REPLY MEMORANDUM OF LAW  
IN SUPPORT OF MOTION TO DISMISS**

I, Randall Martin declare under penalty of perjury as follows:

1. I am duly licensed and admitted to practice law in the State of New York, and I am counsel with the law firm of Shearman & Sterling LLP and counsel for Itaú BBA International (Cayman) Ltd., f/k/a Itaú Europa Luxembourg, S.A., f/k/a Banco Itaú Europa Luxembourg, S.A., (“Banco Itaú”) and Banco Itaú Europa International (“Itaú International”, and collectively, the “Itaú Defendants”). I respectfully submit this declaration in support of the Reply Memorandum of Law in Support of the Itaú Defendants’ Motion to Dismiss.

2. Attached hereto as Exhibit 1 is a true and correct copy of an organization chart showing the corporate parents of Banco Itaú (formerly known as Itaú Europa Luxembourg S.A.).

Executed on June 27, 2022, at New York, New York.

/s/ Randall Martin  
Randall Martin